

ORIGINAL

JAN 21 2009

JAMES N. HATTEN, Clerk

By:

Mr. John Doe, Plaintiff

Pro Se

1.09-CV-151 WSD

1 09-MI-0028

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT  
OF GEORGIA

Mr. John Doe,

Plaintiff,

vs.

COMPLAINT FOR JUDGMENT OF

UNCONSTITUTIONALITY

OF STATE LAW AND

DEPRIVATION

OF A CIVIL RIGHT

UNDER COLOR OF LAW

[42 U.S.C. 1983]

Case:

Assigned To:

Thurbert E. Baker,

Assign. Date:

Office of the Attorney

Description:

General for the State of Georgia, in his official capacity; Appling County Attorney and Sheriff, in their official capacity; Athens-Clarke County District Attorney and Sheriff, in their official capacity; Atkinson County District Attorney and Sheriff, in their official capacity; Bacon County District Attorney and Sheriff, in their official capacity; Baker County District Attorney and Sheriff, in their official capacity; Baldwin County District Attorney and Sheriff, in their official capacity; Banks County District Attorney and Sheriff, in their official capacity; Barrow County District Attorney and Sheriff, in their official capacity; Bartow County District Attorney and Sheriff, in their official capacity; Ben Hill County District Attorney and Sheriff, in their official capacity; Berrien County District Attorney and Sheriff, in their official capacity; Bibb County District Attorney and Sheriff, in their official capacity; Bleckley County District Attorney and Sheriff, in their official capacity; Brantley County District Attorney and Sheriff, in their official capacity; Brooks County District Attorney and Sheriff, in their official capacity; Bryan County District Attorney and Sheriff, in their official capacity; Bulloch County District Attorney and Sheriff, in their official capacity; Burke County District Attorney and Sheriff, in their

official capacity; Butts County District Attorney and Sheriff, in their official capacity; Calhoun County District Attorney and Sheriff, in their official capacity; Camden County District Attorney and Sheriff, in their official capacity; Candler County District Attorney and Sheriff, in their official capacity; Carroll County District Attorney and Sheriff, in their official capacity; Catoosa County District Attorney and Sheriff, in their official capacity; Charlton County District Attorney and Sheriff, in their official capacity; Chatham County District Attorney and Sheriff, in their official capacity; Chattahoochee County District Attorney and Sheriff, in their official capacity; Chattooga County District Attorney and Sheriff, in their official capacity; Cherokee County District Attorney and Sheriff, in their official capacity; Clay County District Attorney and Sheriff, in their official capacity; Clayton County District Attorney and Sheriff, in their official capacity; Clinch County District Attorney and Sheriff, in their official capacity; Cobb County District Attorney and Sheriff, in their official capacity; Coffee County District Attorney and Sheriff, in their official capacity; Colquitt County District Attorney and Sheriff, in their official capacity; Columbia County District Attorney and Sheriff, in their official

capacity; Cook County District Attorney and Sheriff, in their official capacity; Coweta County District Attorney and Sheriff, in their official capacity; Crawford County District Attorney and Sheriff, in their official capacity; Crisp County District Attorney and Sheriff, in their official capacity; Dade County District Attorney and Sheriff, in their official capacity; Dawson County District Attorney and Sheriff, in their official capacity; Decatur County District Attorney and Sheriff, in their official capacity; DeKalb County District Attorney and Sheriff, in their official capacity; Dodge County District Attorney and Sheriff, in their official capacity; Dooly County District Attorney and Sheriff, in their official capacity; Dougherty County District Attorney and Sheriff, in their official capacity; Douglas County District Attorney and Sheriff, in their official capacity; Early County District Attorney and Sheriff, in their official capacity; Echols County District Attorney and Sheriff, in their official capacity; Effingham County District Attorney and Sheriff, in their official capacity; Elbert County District Attorney and Sheriff, in their official capacity; Emanuel County District Attorney and Sheriff, in their official capacity; Evans County District Attorney and Sheriff, in their official capacity; Fannin County District Attorney and Sheriff, in their official

capacity; Fayette County District Attorney and Sheriff, in their official capacity; Floyd County District Attorney and Sheriff, in their official capacity; Forsyth County District Attorney and Sheriff, in their official capacity; Franklin County District Attorney and Sheriff, in their official capacity; Fulton County District Attorney and Sheriff, in their official capacity; Gilmer County District Attorney and Sheriff, in their official capacity; Glascock County District Attorney and Sheriff, in their official capacity; Glynn County District Attorney and Sheriff, in their official capacity; Gordon County District Attorney and Sheriff, in their official capacity; Grady County District Attorney and Sheriff, in their official capacity; Greene County District Attorney and Sheriff, in their official capacity; Gwinnett County District Attorney and Sheriff, in their official capacity; Habersham County District Attorney and Sheriff, in their official capacity; Hall County District Attorney and Sheriff, in their official capacity; Hancock County District Attorney and Sheriff, in their official capacity; Haralson County District Attorney and Sheriff, in their official capacity; Harris County District Attorney and Sheriff, in their official capacity; Hart County District Attorney and Sheriff, in their official capacity; Heard County District Attorney and Sheriff,

in their official capacity; Henry County District Attorney and Sheriff, in their official capacity; Houston County District Attorney and Sheriff, in their official capacity; Irwin County District Attorney and Sheriff, in their official capacity; Jasper County District Attorney and Sheriff, in their official capacity; Jackson County District Attorney and Sheriff, in their official capacity; Jeff Davis County District Attorney and Sheriff, in their official capacity; Jefferson County District Attorney and Sheriff, in their official capacity; Jenkins County District Attorney and Sheriff, in their official capacity; Johnson County District Attorney and Sheriff, in their official capacity; Jones County District Attorney and Sheriff, in their official capacity; Lamar County District Attorney and Sheriff, in their official capacity; Lanier County District Attorney and Sheriff, in their official capacity; Laurens County District Attorney and Sheriff, in their official capacity; Lee County District Attorney and Sheriff, in their official capacity; Liberty County District Attorney and Sheriff, in their official capacity; Lincoln County District Attorney and Sheriff, in their official capacity; Long County District Attorney and Sheriff, in their official capacity; Lowndes County District Attorney and Sheriff, in their official capacity; Lumpkin County District

Attorney and Sheriff, in their official capacity; Macon County District Attorney and Sheriff, in their official capacity; Madison County District Attorney and Sheriff, in their official capacity; Marion County District Attorney and Sheriff, in their official capacity; McDuffie County District Attorney and Sheriff, in their official capacity; McIntosh County District Attorney and Sheriff, in their official capacity; Meriwether County District Attorney and Sheriff, in their official capacity; Miller County District Attorney and Sheriff, in their official capacity; Mitchell County District Attorney and Sheriff, in their official capacity; Monroe County District Attorney and Sheriff, in their official capacity; Montgomery County District Attorney and Sheriff, in their official capacity; Morgan County District Attorney and Sheriff, in their official capacity; Murray County District Attorney and Sheriff, in their official capacity; Muscogee County District Attorney and Sheriff, in their official capacity; Newton County District Attorney and Sheriff, in their official capacity; Oconee County District Attorney and Sheriff, in their official capacity; Oglethorpe County District Attorney and Sheriff, in their official capacity; Paulding County District Attorney and Sheriff, in their official capacity; Peach County District Attorney and Sheriff,

in their official capacity; Pickens County District Attorney and Sheriff, in their official capacity; Pierce County District Attorney and Sheriff, in their official capacity; Pike County District Attorney and Sheriff, in their official capacity; Polk County District Attorney and Sheriff, in their official capacity; Pulaski County District Attorney and Sheriff, in their official capacity; Putnam County District Attorney and Sheriff, in their official capacity; Quitman County District Attorney and Sheriff, in their official capacity; Rabun County District Attorney and Sheriff, in their official capacity; Randolph County District Attorney and Sheriff, in their official capacity; Richmond County District Attorney and Sheriff, in their official capacity; Rockdale County District Attorney and Sheriff, in their official capacity; Schley County District Attorney and Sheriff, in their official capacity; Screven County District Attorney and Sheriff, in their official capacity; Seminole County District Attorney and Sheriff, in their official capacity; Spalding County District Attorney and Sheriff, in their official capacity; Stephens County District Attorney and Sheriff, in their official capacity; Stewart County District Attorney and Sheriff, in their official capacity; Sumter County District Attorney and Sheriff, in their official capacity; Talbot



County District Attorney and Sheriff, in their official capacity; Taliaferro County District Attorney and Sheriff, in their official capacity; Tattnall County District Attorney and Sheriff, in their official capacity; Taylor County District Attorney and Sheriff, in their official capacity; Telfair County District Attorney and Sheriff, in their official capacity; Terrell County District Attorney and Sheriff, in their official capacity; Thomas County District Attorney and Sheriff, in their official capacity; Tift County District Attorney and Sheriff, in their official capacity; Toombs County District Attorney and Sheriff, in their official capacity; Towns County District Attorney and Sheriff, in their official capacity; Treutlen County District Attorney and Sheriff, in their official capacity; Troup County District Attorney and Sheriff, in their official capacity; Turner County District Attorney and Sheriff, in their official capacity; Twiggs County District Attorney and Sheriff, in their official capacity; Union County District Attorney and Sheriff, in their official capacity; Upson County District Attorney and Sheriff, in their official capacity; Walker County District Attorney and Sheriff, in their official capacity; Walton County District Attorney and Sheriff, in their official capacity; Ware County District Attorney and

Sheriff, in their official capacity; Warren County District Attorney and Sheriff, in their official capacity; Washington County District Attorney and Sheriff, in their official capacity; Wayne County District Attorney and Sheriff, in their official capacity; Webster County District Attorney and Sheriff, in their official capacity; Wheeler County District Attorney and Sheriff, in their official capacity; White County District Attorney and Sheriff, in their official capacity; Whitfield County District Attorney and Sheriff, in their official capacity; Wilcox County District Attorney and Sheriff, in their official capacity; Wilkes County District Attorney and Sheriff, in their official capacity; Wilkinson County District Attorney and Sheriff, in their official capacity; Worth County District Attorney and Sheriff, in their official capacity; James E. Donald, Commissioner, Georgia Department of Corrections, in his official capacity;

Defendant(s)

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### JURISDICTION

Jurisdiction is proper before this court, and arises under the First, Fourth, Fifth, and Fourteenth Amendments of the Constitution of the United States of America, Article 1, Section 9, Paragraph 3, of the Constitution of the United States, Article 1, Section 10, of the Constitution of the United States, 18 U.S.C. 242, 2703; and 42 U.S.C. 1983.

Plaintiff, who is a resident of the County of Clayton, State of Georgia, requests that his identity remain confidential as outlined in the attached Motion to Proceed under Pseudonym.

Defendant(s) **Thurbert E. Baker** is the Attorney General of the State of Georgia, located at the Office of the Attorney General, 40 Capitol Square, SW, Atlanta, GA 30440 Capitol Square, SW, Atlanta, GA 30334;

**Appling County District Attorney, Stephen D. Kelley**, in his official capacity; located at 701 "H" Street, Box 301, Brunswick, GA 31520;

**Appling County Sheriff, Benny Deloach**, in his official capacity, located at 103 Cypress Street, Baxley, GA 31513;

**Athens-Clarke County District Attorney, Ken Malden**, in his official capacity; located at 325 East Washington Street, Room 500, Athens, GA 30601;

**Athens-Clarke County Sheriff, Ira Edwards, Jr.**, in his official capacity; located at 325 East Washington Street, Athens, GA 30601;

**Atkinson County District Attorney, Cathy Harris Helms**, in her official capacity; located at P.O. Box 158, Pearson, GA 31642;

**Atkinson County Sheriff, Herman Tucker**, in his official capacity; located at P.O. Box 157, Pearson, GA 31642;

**Bacon County District Attorney, Richard Currie**, in his official capacity; located at 201 State Street, Waycross, GA 31510;

**Bacon County Sheriff, Richard Foskey**, in his official capacity; located at 307 S. Dixon St. (P.O. Box 237), Alma, GA 31510;

**Baker County District Attorney, Joseph K. Mulholland**, in his official capacity; located at P.O. Box 1870, Bainbridge, GA 39818;

**Baker County Sheriff, Isaac Anderson**, in his official capacity; located at P.O. Box 441, Newton, GA 39870;

**Baldwin County District Attorney, Frederic D. Bright,** in his official capacity; located at 121 N. Wilkinson St., Suite 305, Milledgeville, GA 31061-3399;

**Baldwin County Sheriff, William C. Massee, Jr.,** in his official capacity; located at 311 Linda Drive, Milledgeville, GA 31061;

**Banks County District Attorney, Rick Bridgeman,** in his official capacity; located at 33 N. Broad St., Winder, GA 30680;

**Banks County Sheriff, Charles Chapman,** in his official capacity; located at 160 Windmill Farm Road, Homer, GA 30547;

**Barrow County District Attorney, Rick Bridgeman,** in his official capacity; located at 33 N. Broad St., Winder, GA 30680;

**Barrow County Sheriff, Joel Robinson,** in his official capacity; located at 30 N. Broad St., Winder, GA 30680;

**Bartow County District Attorney, T. Joseph "Joe" Campbell,** in his official capacity; located at 135 W. Cherokee Ave., Suite 368, Cartersville, GA 30120;

**Bartow County Sheriff, Clark Millsap,** in his official capacity; located at 104 Zena Dr., Cartersville, GA 30120;

**Ben Hill County District Attorney, Denise Fachini**, in her official capacity; located at P.O. Box 5510, Cordele, GA 31010-5510;

**Ben Hill County Sheriff, Bobby McLemore**, in his official capacity; located at 255 Appomattox Rd., Fitzgerald, GA 31750;

**Berrien County District Attorney, Cathy Harris Helms**, in her official capacity; located at P.O. Box 158, Pearson, GA 31642;

**Berrien County Sheriff, Anthony Heath**, in his official capacity; located at 500 County Farm Rd., Nashville, GA 31639;

**Bibb County District Attorney, Howard Simms**, in his official capacity; located at 601 Mulberry St., Macon, GA 31201;

**Bibb County Sheriff, Jerry Modena**, in his official capacity; located at 668 Oglethorpe St. (P.O. Box 390), Macon, GA 31201;

**Bleckley County District Attorney, Timothy Vaughn**, in his official capacity; located at P.O. Box 1027, Cochran, GA 31014;

**Bleckley County Sheriff, Harold O. Lancaster**, in his official capacity; located at 306 2<sup>nd</sup> Street, Cochran, GA 31014;

**Brantley County District Attorney, Richard Currie**, in his official capacity; located at 201 State Street, Waycross, GA 31510;

**Brantley County Sheriff, Robert Thomas**, in his official capacity; located at Hwy. 82, Nahunta, GA 31553;

**Brooks County District Attorney, J. David Miller**, in his official capacity; located at P.O. Box 99, Valdosta, GA 31603;

**Brooks County Sheriff, Mike Dewey**, in his official capacity; located at P.O. Box 487, Quitman, GA 31643;

**Bryan County District Attorney, Tom Durden**, in his official capacity; located at 945 E.G. Miles Pkwy., Hinesville, GA 31313;

**Bryan County Sheriff, Clyde Smith**, in his official capacity; located at 95 Safety Complex Dr., Pembroke, GA 31321;

**Bulloch County District Attorney, Richard A. Mallard**, in his official capacity; located at 1 Courtland St., 2<sup>nd</sup> Floor, Statesboro, GA 30458;

**Bulloch County Sheriff, Lynn M. Anderson**, in his official capacity; located at 17257 Hwy. 301 North, Statesboro, GA 30458-7500;

**Burke County District Attorney, Daniel J. Craig**, in his official capacity; located at 501 Greene St., Suite 400, Augusta, GA 30901;

**Burke County Sheriff, Gregory T. Coursey**, in his official capacity; located at 225 Hwy. 24 S, Waynesboro, GA 30830;

**Butts County District Attorney, Richard Milam**, in his official capacity; located at 25 West 3<sup>rd</sup> Street, Suite 40, Jackson, GA 30233;

**Butts County Sheriff, Gene Pope**, in his official capacity;  
located at 835 Ernest Biles Dr., Jackson, GA 30233;

**Calhoun County District Attorney, Joseph K. Mulholland**, in his  
official capacity; located at P.O. Box 1870, Bainbridge, GA  
39818;

**Calhoun County Sheriff**, in his official capacity; located at  
66 Court Street, Morgan, GA 39866;

**Camden County District Attorney, Stephen D. Kelley**, in his  
official capacity; located at 701 "H" Street, Box 301,  
Brunswick, GA 31520;

**Camden County Sheriff, William E. Smith**, in his official  
capacity; located at 209 E. 4<sup>th</sup> St., Woodbine, GA 31569;

**Candler County District Attorney, Steve Askew**, in his official  
capacity; located at P.O. Drawer J, Swainsboro, GA 30401;

**Candler County Sheriff**, in his official capacity; located at  
E. Hiawatha, Metter, GA 30439;

**Carroll County District Attorney, Peter "Pete" Skandalakis**, in  
his official capacity; located at Carroll County Courthouse  
Annex, 209 Courtyard Square, Carrollton, GA 30117;

**Carroll County Sheriff, Terry Langley**, in his official  
capacity; located at 1000 Newnan Road, Carrollton, GA 30116;



Catoosa County District Attorney, Herbert "Buzz" Franklin, Jr., in his official capacity; located at 7694 Nashville Street, P.O. Box 1025, Ringgold, GA 30736;

Catoosa County Sheriff, Phil Summers, in his official capacity; located at 5842 Highway 41, Ringgold, GA 30736;

Charlton County District Attorney, Richard Currie, in his official capacity; located at 201 State Street, Waycross, GA 31510;

Charlton County Sheriff, in his official capacity; located at 100 Third St., Folkston, GA 31537;

Chatham County District Attorney, Spencer Lawton, Jr., in his official capacity; located at 133 Montgomery Street, Savannah, GA 31401;

Chatham County Sheriff, in his official capacity; located at 1050 Carl Griffin Drive, Savannah, GA 31405;

Chattahoochee County District Attorney, J. Gray Conger, in his official capacity; located at P.O. Box 1340, Columbus, GA 31902;

Chattahoochee County Sheriff, in his official capacity; located at Broad Street, Cusseta, GA 31805;

Chattooga County District Attorney, Herbert "Buzz" Franklin, Jr., in his official capacity; located at 7694 Nashville Street, P.O. Box 1025, Ringgold, GA 30736;

**Chattooga County Sheriff, Ralph Kellett**, in his official capacity; located at 35 West Washington St., Summerville, GA 30747;

**Cherokee County District Attorney, Gary T. Moss**, in his official capacity; located at 90 North Street, Suite 390, Canton, GA 30114;

**Cherokee County Sheriff**, in his official capacity; located at Cherokee County Courthouse, 498 Chattin Drive, Canton, GA 30115;

**Clay County District Attorney, Charles M. Ferguson**, in his official capacity; located at P.O. Drawer 30, Cuthbert, GA 39840;

**Clay County Sheriff, Roger Shivers**, in his official capacity; located at P.O. Box 22, Washington Street, Fort Gaines, GA 39851;

**Clayton County District Attorney, Tracy Graham Lawson**, in her official capacity; located at the Harold R. Banke Justice Center, 4<sup>th</sup> Floor, 9151 Tara Boulevard, Jonesboro, Georgia 30236;

**Clayton County Sheriff, Kemuel A. Kimbrough**, in his official capacity; located at the Harold R. Banke Justice Center, 9157 Tara Boulevard, Jonesboro, Georgia 30236;

Clinch County District Attorney, Cathy Harris Helms, in her official capacity; located at P.O. Box 158, Pearson, GA 31642;  
Clinch County Sheriff, in his official capacity; located at 100 Court Street, Homerville, GA 31634;

Cobb County District Attorney, Patrick H. Head, in his official capacity; located at 10 East Park Square, 5<sup>th</sup> Floor, Marietta, GA 30090;

Cobb County Sheriff, Neil Warren, in his official capacity; located at 185 Roswell Street, Public Safety Building, 2<sup>nd</sup> Floor, Marietta, GA 30090-9650;

Coffee County District Attorney, Richard Currie, in his official capacity; located at 201 State Street, Waycross, GA 31510;

Coffee County Sheriff, Jerry Pope, in his official capacity; located at 225 W. Bryan St., Douglas, GA 31533;

Colquitt County District Attorney, J. David Miller, in his official capacity; located at P.O. Box 99, Valdosta, GA 31603;

Colquitt County Sheriff, Al Whittington, in his official capacity; located at 200 Veterans Parkway, P.O. Box 188, Moultrie, GA 31776;

Columbia County District Attorney, Daniel J. Craig, in his official capacity; located at 501 Greene St., Suite 400, Augusta, GA 30901;

**Columbia County Sheriff, Clay N. Whittle**, in his official capacity; located at P.O. Box 310, 2273 County Camp Road, Appling, GA 30802-0310;

**Cook County District Attorney, Cathy Harris Helms**, in her official capacity; located at P.O. Box 158, Pearson, GA 31642;

**Cook County Sheriff, Charles Bryant**, in his official capacity; located at 1000 County Farm Road, Adel, GA 31620;

**Coweta County District Attorney, Peter "Pete" Skandalakis**, in his official capacity; located at 72 Greenville Street (P.O. Box 2564), Newnan, GA 30264;

**Coweta County Sheriff, Michael Yeager**, in his official capacity; located at 560 Greison Trail, Newnan, GA 30263;

**Crawford County District Attorney, Howard Simms**, in his official capacity; located at 601 Mulberry St., Macon, GA 31201;

**Crawford County Sheriff**, in his official capacity; located at Agency & Hortman Mill Road, Knoxville, GA 31078;

**Crisp County District Attorney, Denise Fachini**, in her official capacity; located at P.O. Box 5510, Cordele, GA 31010-5510;

**Crisp County Sheriff, Donnie Haralson**, in his official capacity; located at 196 Ga. Highway 300 South, Cordele, GA 31015;

Dade County District Attorney, Herbert "Buzz" Franklin, Jr., in his official capacity; located at 7694 Nashville Street, P.O. Box 1025, Ringgold, GA 30736;

Dade County Sheriff, in his official capacity; located at 75 Case Ave., Trenton, GA 30752;

Dawson County District Attorney, Jason Deal, in his official capacity; located at P.O. Box 1690, Gainesville, GA 30503;

Dawson County Sheriff, Billy Carlisle, in his official capacity; located at 189 Hwy. 53 West, Suite 201, Dawsonville, GA 30534;

Decatur County District Attorney, Joseph K. Mulholland, in his official capacity; located at P.O. Box 1870, Bainbridge, GA 39818;

Decatur County Sheriff, Wiley Griffin, in his official capacity; located at 912 Spring Creek Road, Bainbridge, GA 39817;

DeKalb County District Attorney, Gwendolyn Keyes Fleming, in her official capacity; located at 556 North McDonough Street, 7<sup>th</sup> Floor, Decatur, GA 30030;

DeKalb County Sheriff, Thomas E. Brown, Jr., in his official capacity; located at 4425 Memorial Drive, Decatur, GA 30032;

Dodge County District Attorney, Timothy Vaughn, in his official capacity; located at P.O. Box 1027, Cochran, GA 31014;

Dodge County Sheriff, Ed Graham, in his official capacity; located at Courthouse Circle, Eastman, GA 31023;

Dooly County District Attorney, Denise Fachini, in her official capacity; located at P.O. Box 5510, Cordele, GA 31010-5510;

Dooly County Sheriff, L. Van Peavy, Jr., in his official capacity; located at Dooly County Justice Center, P.O. Box 96, 576 Pinehurst/Hawkinsville Rd., Pinehurst, GA 31070;

Dougherty County District Attorney, Ken Hodges, in his official capacity; located at 225 Pine Ave., P.O. Box 1827, Albany, GA 31702;

Dougherty County Sheriff, Jamil Saba, in his official capacity; located at 225 Pine Ave., Albany, GA 31702;

Douglas County District Attorney, David McDade, in his official capacity; located at 8700 Hospital Drive, Main Floor, Douglas County Courthouse, Douglasville, GA 30134;

Douglas County Sheriff, Phil Miller, in his official capacity; located at 6856 Broad Street, Douglasville, GA 30134;

**Early County District Attorney, Charles M. Ferguson,** in his official capacity; located at P.O. Drawer 30, Cuthbert, GA 39840;

**Early County Sheriff,** in his official capacity; located at Court Square, Blakely, GA 39823;

**Echols County District Attorney, J. David Miller,** in his official capacity; located at P.O. Box 99, Valdosta, GA 31603;

**Echols County Sheriff, Randy Coursen,** in his official capacity; located at P.O. Box 189, Statenville, GA 31648;

**Effingham County District Attorney, Richard A. Mallard,** in his official capacity; located at 1 Courtland St., 2<sup>nd</sup> Floor, Statesboro, GA 30458;

**Effingham County Sheriff, Jimmy McDuffie,** in his official capacity; located at P.O. Box 1015, Springfield, GA 31329;

**Elbert County District Attorney, Robert W. Lavender,** in his official capacity; located at P.O. Box 515, Hartwell, GA 30643;

**Elbert County Sheriff, Barry Haston,** in his official capacity; located at 47 Forest Avenue, Elberton, GA 30635;

**Emanuel County District Attorney, Steve Askew,** in his official capacity; located at P.O. Drawer J, Swainsboro, GA 30401;

**Emanuel County Sheriff,** in his official capacity; located at 101 Court Street, Swainsboro, GA 30401;

**Evans County District Attorney, Tom Durden**, in his official capacity; located at 945 E.G. Miles Pkwy., Hinesville, GA 31313;

**Evans County Sheriff**, in his official capacity; located at Courthouse Street, Claxton, GA 30417;

**Fannin County District Attorney, Joe W. Hendricks, Jr.**, in his official capacity; located at 1 Westside Square, P.O. Box 32, Ellijay, GA 30540;

**Fannin County Sheriff, George Ensley**, in his official capacity; located at 172 Church St., Blue Ridge, GA 30513;

**Fayette County District Attorney, Scott L. Ballard**, in his official capacity; located at P.O. Box 1498, 1 Center Drive, Fayetteville, GA 30214-6498;

**Fayette County Sheriff, Randall Johnson**, in his official capacity; located at Fayette County Sheriff's Office, 155 Johnson Avenue, Fayetteville, GA 30214;

**Floyd County District Attorney, Leigh Patterson**, in her official capacity; located at 3 Government Plaza, Suite 302, Rome, GA 30161;

**Floyd County Sheriff, Tim Burkhalter**, in his official capacity; located at 2526 New Calhoun Highway, Rome, GA 30161;



**Forsyth County District Attorney, Penny A. Penn,** in her official capacity; located at 100 Courthouse Square, Suite 200, Cumming, GA 30040;

**Forsyth County Sheriff, Ted Paxton,** in his official capacity; located at 202 Veterans Memorial Boulevard, Cumming, GA 30040;

**Franklin County District Attorney, Robert W. Lavender,** in his official capacity; located at P.O. Box 515, Hartwell, GA 30643;

**Franklin County Sheriff, Stevie D. Thomas,** in his official capacity; located at 1 James Little St., Carnesville, GA 30521;

**Fulton County District Attorney, Paul L. Howard, Jr.,** in his official capacity; located at 136 Pryor Street SW, Third Floor, Atlanta, GA 30303;

**Fulton County Sheriff, Myron Freeman,** in his official capacity; located at Fulton County Justice Center Tower, 185 Central Avenue SW, Atlanta, GA 30303;

**Gilmer County District Attorney, Joe W. Hendricks, Jr.,** in his official capacity; located at 1 Westside Square, P.O. Box 32, Ellijay, GA 30540;

**Gilmer County Sheriff, Stacey Nicholson,** in his official capacity; located at 106 Brett Dickey Memorial Drive, Ellijay, GA 30540;

**Glascock County District Attorney, Dennis C. Sanders**, in his official capacity; located at P.O. Drawer 966, Thompson, GA 30824;

**Glascock County Sheriff, Dean A. Couch**, in his official capacity; located at 62 E. Main Street, Gibson, GA 30810;

**Glynn County District Attorney, Stephen D. Kelley**, in his official capacity; located at 701 "H" Street, Box 301, Brunswick, GA 31520;

**Glynn County Sheriff, Wayne V. Bennett**, in his official capacity; located at 1812 Newcastle Street, Brunswick, GA 31520;

**Gordon County District Attorney, T. Joseph "Joe" Campbell**, in his official capacity; located at Gordon County Courthouse, 100 South Wall Street, Second Floor, Calhoun, GA 30701;

**Gordon County Sheriff, Jerry Davis**, in his official capacity; located at Gordon County Courthouse Annex, 101 Piedmont Street, Second Floor, Calhoun, GA 30701;

**Grady County District Attorney, Joseph K. Mulholland**, in his official capacity; located at P.O. Box 1870, Bainbridge, GA 39818;

**Grady County Sheriff, Harry Young**, in his official capacity; located at P.O. Box 690, 115 16<sup>th</sup> Ave. NE, Cairo, GA 39828;

**Greene County District Attorney, Frederic D. Bright,** in his official capacity; located at 121 N. Wilkinson St., Suite 305, Milledgeville, GA 31061-3399;

**Greene County Sheriff, Chris Houston,** in his official capacity; located at 1201 South Industrial Boulevard, Greensboro, GA 30642;

**Gwinnett County District Attorney, Daniel J. "Danny" Porter,** in his official capacity; located at Gwinnett County Justice and Administration Center, 75 Langley Drive, Lawrenceville, GA 30045;

**Gwinnett County Sheriff, R.L. "Butch" Conway,** in his official capacity; located at Gwinnett County Detention Center, 2900 University Parkway, Lawrenceville, GA 30043;

**Habersham County District Attorney, Michael "Mike" Crawford,** in his official capacity; located at 555 Monroe Street, Clarkesville, GA 30523;

**Habersham County Sheriff, DeRay Fincher,** in his official capacity; located at 1000 Detention Drive, Clarkesville, GA 30523;

**Hall County District Attorney, Jason Deal,** in his official capacity; located at P.O. Box 1690, Gainesville, GA 30503;

**Hall County Sheriff, Steve Cronin,** in his official capacity; located at 610 Main St., Gainesville, GA 30501;

**Hancock County District Attorney, Frederic D. Bright,** in his official capacity; located at 121 N. Wilkinson St., Suite 305, Milledgeville, GA 31061-3399;

**Hancock County Sheriff, Tomyln Terrell Primus,** in his official capacity; located at 820 Spring Street, Sparta, GA 31087;

**Haralson County District Attorney, Don Wilson,** in his official capacity; located at Polk County Courthouse #1, 100 Prior Street, Room 204, Cedartown, GA 30125;

**Haralson County Sheriff, Eddie Mixon,** in his official capacity; located at 224 Holly Street, Buchanan, GA 30113;

**Harris County District Attorney, J. Gray Conger,** in his official capacity; located at P.O. Box 1340, Columbus, GA 31902;

**Harris County Sheriff,** in his official capacity; located at 9825 Hwy. 116, Hamilton, GA 31811;

**Hart County District Attorney, Robert W. Lavender,** in his official capacity; located at P.O. Box 515, Hartwell, GA 30643;

**Hart County Sheriff, Mike Cleveland,** in his official capacity; located at 155 Carolina Street, Hartwell, GA 30643;

**Heard County District Attorney, Peter "Pete" Skandalakis,** in his official capacity; located at Carroll County Courthouse Annex, 209 Courtyard Square, Carrollton, GA 30117;

Heard County Sheriff, Ross Henry, in his official capacity;  
located at 215 Courthouse Square, Franklin, GA 30217;

Henry County District Attorney, Tommy K. Floyd, in his  
official capacity; located at Henry County Courthouse, One  
Courthouse Square, 2<sup>nd</sup> Floor, West Tower, McDonough, GA 30253;

Henry County Sheriff, Donald Chaffin, in his official  
capacity; located at 120 Henry Parkway, McDonough, GA 30253;

Houston County District Attorney, Kelly R. Burke, in his  
official capacity; located at 201 North Perry Parkway, Perry,  
GA 31069;

Houston County Sheriff, Cullen Talton, in his official  
capacity; located at 202 Carl Vinson Pkwy., Warner Robins, GA  
31088;

Irwin County District Attorney, C. Paul Bowden, in his  
official capacity; located at P.O. Box 1252, Tifton, GA 31793-  
1252;

Irwin County Sheriff, Donnie E. Youghn, in his official  
capacity; located at 400 South Irwin Ave., Ocilla, GA 31774;

Jackson County District Attorney, Rick Bridgeman, in his  
official capacity; located at 33 N. Broad St., Winder, GA  
30680;

**Jackson County Sheriff, Stan E. Evans**, in his official capacity; located at 268 Curtis E. Spence Drive, Jefferson, GA 30549;

**Jasper County District Attorney, Frederic D. Bright**, in his official capacity; located at 121 N. Wilkinson St., Suite 305, Milledgeville, GA 31061-3399;

**Jasper County Sheriff, Charles Roper**, in his official capacity; located at 1551 Hwy. 212 W., Monticello, GA 31064;

**Jeff Davis County District Attorney, Stephen D. Kelley**, in his official capacity; located at 701 "H" Street, Box 301, Brunswick, GA 31520;

**Jeff Davis County Sheriff**, in his official capacity; located at 100 Jeff Davis St., Hazelhurst, GA 31539;

**Jefferson County District Attorney, Steve Askew**, in his official capacity; located at P.O. Drawer J, Swainsboro, GA 30401;

**Jefferson County Sheriff**, in his official capacity; located at 415 Green St., Louisville, GA 30434;

**Jenkins County District Attorney, Richard A. Mallard**, in his official capacity; located at 1 Courtland St., 2<sup>nd</sup> Floor, Statesboro, GA 30458;

**Jenkins County Sheriff**, in his official capacity; located at 112 S. Masonic, Millen, GA 30442;



**Johnson County District Attorney, Craig Fraser,** in his official capacity; located at P.O. Box 2029, Dublin, GA 31040-2029;

**Johnson County Sheriff, Rusty Oxford,** in his official capacity; located at 151 N. Bradford St., Wrightsville, GA 31096;

**Jones County District Attorney, Frederic D. Bright,** in his official capacity; located at 121 N. Wilkinson St., Suite 305, Milledgeville, GA 31061-3399;

**Jones County Sheriff, R. N. "Butch" Reece,** in his official capacity; located at 123 Holmes Hawkins Drive, P.O. Box 874, Gray, GA 31032;

**Lamar County District Attorney, Richard Milam,** in his official capacity; located at 25 West 3<sup>rd</sup> Street, Suite 40, Jackson, GA 30233;

**Lamar County Sheriff, Joseph Buice,** in his official capacity; located at 121 Roberta Drive, Barnesville, GA 30204;

**Lanier County District Attorney, Cathy Harris Helms,** in her official capacity; located at P.O. Box 158, Pearson, GA 31642;

**Lanier County Sheriff, Charles "Nick" Norton,** in his official capacity; located at 100 Main Street, Courthouse Building, Lakeland, GA 31635;



**Laurens County District Attorney, Craig Fraser,** in his official capacity; located at P.O. Box 2029, Dublin, GA 31040-2029;

**Laurens County Sheriff, W.A. "Bill" Harrell,** in his official capacity; located at 511 Southern Pines Road, Dublin, GA 31021;

**Lee County District Attorney, Cecilia M. Cooper,** in her official capacity; located at P.O. Box 1328, Americus, GA 31709;

**Lee County Sheriff, Harold Breeden,** in his official capacity; located at 100 Leslie Hwy., Leesburg, GA 31763;

**Liberty County District Attorney, Tom Durden,** in his official capacity; located at 945 E.G. Miles Pkwy., Hinesville, GA 31313;

**Liberty County Sheriff,** in his official capacity; located at Main Street Courthouse, Hinesville, GA 31313;

**Lincoln County District Attorney, Dennis C. Sanders,** in his official capacity; located at P.O. Drawer 966, Thompson, GA 30824;

**Lincoln County Sheriff, Gerald S. Lawson,** in his official capacity; located at 145 School St., Lincolnton, GA 30817;

Long County District Attorney, Tom Durden, in his official capacity; located at 945 E.G. Miles Pkwy., Hinesville, GA 31313;

Long County Sheriff, Cecil Nobles, in his official capacity; located at P.O. Box 368, Ludowici, GA 31316;

Lowndes County District Attorney, J. David Miller, in his official capacity; located at P.O. Box 99, Valdosta, GA 31603;

Lowndes County Sheriff, Ashley Paulk, in his official capacity; located at P.O. Box 667, Valdosta, GA 31603;

Lumpkin County District Attorney, Stan Gunter, in his official capacity; located at 114 Court House Street, Blairsville, GA 30512;

Lumpkin County Sheriff, Stacy Jarrard, in his official capacity; located at 385 E. Main St., Dahlonega, GA 30533;

Macon County District Attorney, Cecilia M. Cooper, in her official capacity; located at P.O. Box 1328, Americus, GA 31709;

Macon County Sheriff, Charles M. Cannon, Sr., in his official capacity; located at P.O. Box 345, 117 Crescent St., Oglethorpe, GA 31068;

Madison County District Attorney, Robert W. Lavender, in his official capacity; located at P.O. Box 515, Hartwell, GA 30643;

**Madison County Sheriff, Clayton Lowe,** in his official capacity; located at Madison County Sheriff's Office & Detention Center Complex, 1436 Hwy. 98 W., Danielsville, GA 30633;

**Marion County District Attorney, J. Gray Conger,** in his official capacity; located at P.O. Box 1340, Columbus, GA 31902;

**Marion County Sheriff, Horace Snider,** in his official capacity; located at Hwy 41 N., Buena Vista, GA 31803;

**McDuffie County District Attorney, Dennis C. Sanders,** in his official capacity; located at P.O. Drawer 966, Thompson, GA 30824;

**McDuffie County Sheriff, Logan Marshall,** in his official capacity; located at P.O. Box 360, Thompson, GA 30824;

**McIntosh County District Attorney, Tom Durden,** in his official capacity; located at 945 E.G. Miles Pkwy., Hinesville, GA 31313;

**McIntosh County Sheriff, Charles W. Jones,** in his official capacity; located at 404 Northway, Darien, GA 31305;

**Meriwether County District Attorney, Peter "Pete" Skandalakis,** in his official capacity; located at Carroll County Courthouse Annex, 209 Courtyard Square, Carrollton, GA 30117;

**Meriwether County Sheriff, Steve Whitlock**, in his official capacity; located at 17400 Roosevelt Hwy., Greenville, GA 30222;

**Miller County District Attorney, Charles M. Ferguson**, in his official capacity; located at P.O. Drawer 30, Cuthbert, GA 39840;

**Miller County Sheriff**, in his official capacity; located at 300 W. Pine St., Colquitt, GA 39837;

**Mitchell County District Attorney, Joseph K. Mulholland**, in his official capacity; located at P.O. Box 1870, Bainbridge, GA 39818;

**Mitchell County Sheriff**, in his official capacity; located at 4815 Highway 37, Camilla, GA 31730;

**Monroe County District Attorney, Richard Milam**, in his official capacity; located at 25 West 3<sup>rd</sup> Street, Suite 40, Jackson, GA 30233;

**Monroe County Sheriff, John Cary Bittick**, in his official capacity; located at 145 L.C. Bittick Drive, P.O. Box 1248, Forsyth, GA 31029;

**Montgomery County District Attorney, Timothy Vaughn**, in his official capacity; located at P.O. Box 1027, Cochran, GA 31014;

**Montgomery County Sheriff, Clarence Sanders,** in his official capacity; located at 208 Broad Street, Mount Vernon, GA 30445;

**Morgan County District Attorney, Frederic D. Bright,** in his official capacity; located at 121 N. Wilkinson St., Suite 305, Milledgeville, GA 31061-3399;

**Morgan County Sheriff, Robert Markley,** in his official capacity; located at 2380 Athens Highway, Madison, GA 30650;

**Murray County District Attorney, Kermit McManus,** in his official capacity; located at P.O. Box 1086, Dalton, GA 30722;

**Murray County Sheriff, Howard Ensley,** in his official capacity; located at 810 ½ GI Maddox Pkwy., Chatsworth, GA 30705;

**Muscogee County District Attorney, J. Gray Conger,** in his official capacity; located at P.O. Box 1340, Columbus, GA 31902;

**Muscogee County Sheriff, Ralph Johnson,** in his official capacity; located at 100 10<sup>th</sup> Street, 4<sup>th</sup> Floor, Government Center, Columbus, GA 31902;

**Newton County District Attorney, W. Kendall Wynne, Jr.,** in his official capacity; located at Newton County Judicial Building, 1132 Usher Street, Covington, GA 30014;

**Newton County Sheriff, Joe Nichols,** in his official capacity; located at 15151 Alcovy-Jersey Road NE, Covington, GA 30014;

**Oconee County District Attorney, Ken Malden**, in his official capacity; located at 325 East Washington Street, Room 500, Athens, GA 30601;

**Oconee County Sheriff**, in his official capacity; located at 1140 Experiment Station Rd., Watkinsville, GA 30677;

**Oglethorpe County District Attorney, Robert W. Lavender**, in his official capacity; located at P.O. Box 515, Hartwell, GA 30643;

**Oglethorpe County Sheriff, Mike Smith**, in his official capacity; located at Hwy. 78, Lexington, GA 30648;

**Paulding County District Attorney, F.A. "Drew" Lane, Jr.**, in his official capacity; located at 11 Courthouse Square, Room 101, Dallas, GA 30132;

**Paulding County Sheriff, Bruce Harris**, in his official capacity; located at 247 Industrial Way North, Dallas, GA 30132;

**Peach County District Attorney, Howard Simms**, in his official capacity; located at 601 Mulberry St., Macon, GA 31201;

**Peach County Sheriff, Terry W. Dease**, in his official capacity; located at P.O. Box 510, Fort Valley, GA 31030;

**Pickens County District Attorney, Joe W. Hendricks, Jr.**, in his official capacity; located at 1 Westside Square, P.O. Box 32, Ellijay, GA 30540;

**Pickens County Sheriff, Billy Wofford,** in his official capacity; located at 2985 Camp Road, Jasper, GA 30143;

**Pierce County District Attorney, Richard Currie,** in his official capacity; located at 201 State Street, Waycross, GA 31510;

**Pierce County Sheriff,** in his official capacity; located at Courthouse, Blackshear, GA 31516;

**Pike County District Attorney, Scott L. Ballard,** in his official capacity; located at P.O. Box 1498, 1 Center Drive, Fayetteville, GA 30214-6498;

**Pike County Sheriff, Jimmy Thomas,** in his official capacity; located at P.O. Box 236, 89 Jackson Street, Zebulon, GA 30295;

**Polk County District Attorney, Don Wilson,** in his official capacity; located at Polk County Courthouse #1, 100 Prior Street, Room 204, Cedartown, GA 30125;

**Polk County Sheriff, Robert S. Sparks,** in his official capacity; located at 1676 Rockmart Hwy., Cedartown, GA 30125;

**Pulaski County District Attorney, Timothy Vaughn,** in his official capacity; located at P.O. Box 1027, Cochran, GA 31014;

**Pulaski County Sheriff, Jerry L. Lancaster,** in his official capacity; located at 350 Commerce Street, Hawkinsville, GA 31036;

**Putnam County District Attorney, Frederic D. Bright,** in his official capacity; located at 121 N. Wilkinson St., Suite 305, Milledgeville, GA 31061-3399;

**Putnam County Sheriff,** in his official capacity; located at 111 Ridley Drive, Eatonton, GA 31024;

**Quitman County District Attorney, Charles M. Ferguson,** in his official capacity; located at P.O. Drawer 30, Cuthbert, GA 39840;

**Quitman County Sheriff, Lon Ming,** in his official capacity; located at 111 Main Street, Georgetown, GA 39854;

**Rabun County District Attorney, Michael Crawford,** in his official capacity; located at 205 N. Alexander St., Suite 208, Toccoa, GA 35077;

**Rabun County Sheriff,** in his official capacity; located at 25 Courthouse Square, Clayton, GA 30525;

**Randolph County District Attorney, Charles M. Ferguson,** in his official capacity; located at P.O. Drawer 30, Cuthbert, GA 39840;

**Randolph County Sheriff, Gary Yochum, Sr.,** in his official capacity; located at 101 Peachtree Street, Cuthbert, GA 39840;

**Richmond County District Attorney, Daniel J. Craig,** in his official capacity; located at 501 Greene St., Suite 400, Augusta, GA 30901;



**Richmond County Sheriff, Ronald Strength,** in his official capacity; located at Law Enforcement Center, 401 Walton Way, Augusta, GA 30901;

**Rockdale County District Attorney, Richard R. Read,** in his official capacity; located at 922 Court Street, Room 201, Conyers, GA 30012;

**Rockdale County Sheriff, Jeff Wigington,** in his official capacity; located at 911 Chambers Drive, Conyers, GA 30012;

**Schley County District Attorney, Cecilia M. Cooper,** in her official capacity; located at P.O. Box 1328, Americus, GA 31709;

**Schley County Sheriff,** in his official capacity; located at 101 N. Pecan St., Ellaville, GA 31806;

**Screven County District Attorney, Richard A. Mallard,** in his official capacity; located at 1 Courtland St., 2<sup>nd</sup> Floor, Statesboro, GA 30458;

**Screven County Sheriff,** in his official capacity; located at 339 Rocky Ford Rd., Sylvania, GA 30467;

**Seminole County District Attorney, Charles M. Ferguson,** in his official capacity; located at P.O. Drawer 30, Cuthbert, GA 39840;

**Seminole County Sheriff,** in his official capacity; located at 208 Court St., Donalsonville, GA 39845;

**Spalding County District Attorney, Scott L. Ballard**, in his official capacity; located at P.O. Box 1498, 1 Center Drive, Fayetteville, GA 30214-6498;

**Spalding County Sheriff, Dee Stewart**, in his/her official capacity; located at 401 Justice Boulevard, Griffin, GA 30224;

**Stephens County District Attorney, Michael Crawford**, in his official capacity; located at 205 N. Alexander Street, Suite 208, Toccoa, GA 35077;

**Stephens County Sheriff, Gene Sorrells**, in his official capacity; located at 205 N. Alexander Street, Suite 205, Toccoa, GA 35077;

**Stewart County District Attorney, Cecilia M. Cooper**, in her official capacity; located at P.O. Box 1328, Americus, GA 31709;

**Stewart County Sheriff, Larry Jones**, in his official capacity; located at Broad Street, Lumpkin, GA 31815;

**Sumter County District Attorney, Cecilia M. Cooper**, in her official capacity; located at P.O. Box 1328, Americus, GA 31709;

**Sumter County Sheriff, Pete Smith**, in his official capacity; located at P.O. Box 726, 352 McMath Mill Rd., Americus, GA 31709;

**Talbot County District Attorney, J. Gray Conger,** in his official capacity; located at P.O. Box 1340, Columbus, GA 31902;

**Talbot County Sheriff,** in his official capacity; located at P.O. Box 544, Talbotton, GA 31827;

**Taliaferro County District Attorney, Dennis C. Sanders,** in his official capacity; located at P.O. Drawer 966, Thompson, GA 30824;

**Taliaferro County Sheriff,** in his official capacity; located at Monument Square, Crawfordville, GA 30631;

**Tattnall County District Attorney, Tom Durden,** in his official capacity; located at 945 E.G. Miles Pkwy., Hinesville, GA 31313;

**Tattnall County Sheriff,** in his official capacity; located at P.O. Box 545, Reidsville, GA 30453;

**Taylor County District Attorney, J. Gray Conger,** in his official capacity; located at P.O. Box 1340, Columbus, GA 31902;

**Taylor County Sheriff, Jeff Watson,** in his official capacity; located at 101 N. Ivy, Butler, GA 31006;

**Telfair County District Attorney, Timothy Vaughn,** in his official capacity; located at P.O. Box 1027, Cochran, GA 31014;

**Telfair County Sheriff, Jimmie W. Williamson**, in his official capacity; located at 124 E. Oak St., McRae, GA 31055;

**Terrell County District Attorney, Charles M. Ferguson**, in his official capacity; located at P.O. Drawer 30, Cuthbert, GA 39840;

**Terrell County Sheriff, John Bowens**, in his official capacity; located at 513 S. Main St., Dawson, GA 39842;

**Thomas County District Attorney, J. David Miller**, in his official capacity; located at P.O. Box 99, Valdosta, GA 31603;

**Thomas County Sheriff, R. Carlton Powell**, in his official capacity; located at 921 Smith Ave., Thomasville, GA 31792;

**Tift County District Attorney, C. Paul Bowden**, in his official capacity; located at P.O. Box 1252, Tifton, GA 31793-1252;

**Tift County Sheriff**, in his official capacity; located at 500 Morgan Drive, Tifton, GA 31794;

**Toombs County District Attorney, Steve Askew**, in his official capacity; located at P.O. Drawer J, Swainsboro, GA 30401;

**Toombs County Sheriff, Alvie Lee Kight, Jr.**, in his official capacity; located at 357 NW Broad St., Suite 1, Lyons, GA 30436;

**Towns County District Attorney, Stan Gunter**, in his official capacity; located at 114 Court House Street, Blairsville, GA 30512;

**Towns County Sheriff, Chris Clinton**, in his official capacity;  
located at 4070 A Hwy. 339, Young Harris, GA 30582;

**Treutlen County District Attorney, Craig Fraser**, in his  
official capacity; located at P.O. Box 2029, Dublin, GA 31040-  
2029;

**Treutlen County Sheriff**, in his official capacity; located at  
110 3<sup>rd</sup> Street, Soperton, GA 30457;

**Troup County District Attorney, Peter "Pete" Skandalakis**, in  
his official capacity; located at 100 Ridley Avenue, LaGrange,  
GA 30241;

**Troup County Sheriff, Donny Turner**, in his official capacity;  
located at 100 Ridley Avenue, LaGrange, GA 30241;

**Turner County District Attorney, C. Paul Bowden**, in his  
official capacity; located at P.O. Box 1252, Tifton, GA 31793-  
1252;

**Turner County Sheriff, Randy Kendrick**, in his official  
capacity; located at 1301 Industrial Drive, Ashburn, GA 31714;

**Twiggs County District Attorney, Craig Fraser**, in his official  
capacity; located at P.O. Box 2029, Dublin, GA 31040-2029;

**Twiggs County Sheriff, R. Darren Mitchum**, in his official  
capacity; located at P.O. Box 650, 37 North Ash Street,  
Jeffersonville, GA 31044;

**Union County District Attorney, Stan Gunter**, in his official capacity; located at 114 Court House Street, Blairsville, GA 30512;

**Union County Sheriff, Scott Stevens**, in his official capacity; located at 940 Beasley Street, Blairsville, GA 30512;

**Upson County District Attorney, Scott L. Ballard**, in his official capacity; located at P.O. Box 1498, 1 Center Drive, Fayetteville, GA 30214-6498;

**Upson County Sheriff, Donald Peacock**, in his official capacity; located at 235 Aviation Drive, Thomaston, GA 30286;

**Walker County District Attorney, Herbert "Buzz" Franklin**, in his official capacity; located at P.O. Box 1025, 305 South Hightower Street, Drake Building, Suite 180, LaFayette, GA 30728;

**Walker County Sheriff, Steve Wilson**, in his official capacity; located at 105 South Duke Street, P.O. Box 767, Lafayette, GA 30728;

**Walton County District Attorney, W. Kendall Wynne, Jr.**, in his official capacity; located at Newton County Judicial Building, 1132 Usher Street, Covington, GA 30014;

**Walton County Sheriff, Joe Chapman**, in his official capacity; located at 1425 South Madison Avenue, Monroe, GA 30655;

**Ware County District Attorney, Richard Currie**, in his official capacity; located at 201 State Street, Waycross, GA 31510;

**Ware County Sheriff, Ronnie H. McQuaig**, in his official capacity; located at 3487 Harris Road, Waycross, GA 31503;

**Warren County District Attorney, Dennis C. Sanders**, in his official capacity; located at P.O. Drawer 966, Thompson, GA 30824;

**Warren County Sheriff**, in his official capacity; located at Courthouse, 100 Main Street, Warrenton, GA 30828;

**Washington County District Attorney, Steve Askew**, in his official capacity; located at P.O. Drawer J, Swainsboro, GA 30401;

**Washington County Sheriff, Thomas H. Smith**, in his official capacity; located at 1735 Kaolin Road, P.O. Drawer 30, Sandersville, GA 31082;

**Wayne County District Attorney, Stephen D. Kelley**, in his official capacity; located at 701 "H" Street, Box 301, Brunswick, GA 31520;

**Wayne County Sheriff**, in his official capacity; located at 1355 West Orange St., Jesup, GA 31545;

**Webster County District Attorney, Cecilia M. Cooper**, in her official capacity; located at P.O. Box 1328, Americus, GA 31709;

**Webster County Sheriff**, in his official capacity; located at Church St., Preston, GA 31824;

**Wheeler County District Attorney, Timothy Vaughn**, in his official capacity; located at P.O. Box 1027, Cochran, GA 31014;

**Wheeler County Sheriff**, in his official capacity; located at P.O. Box 126, Alamo, GA 30411;

**White County District Attorney, N. Stanley "Stan" Gunter**, in his official capacity; located at 59 South Main Street, Box 14, Cleveland, GA 30528;

**White County Sheriff, Neal Walden**, in his official capacity; located at 1210 Hulsey Road, Cleveland, GA 30528;

**Whitfield County District Attorney, Kermit McManus**, in his official capacity; located at P.O. Box 1086, Dalton, GA 30722;

**Whitfield County Sheriff**, in his official capacity; located at 501 W. Waugh Street, Dalton, GA 30720;

**Wilcox County District Attorney, Denise Fachini**, in her official capacity; located at P.O. Box 5510, Cordele, GA 31010-5510;

**Wilcox County Sheriff**, in his official capacity; located at 22 Park Ave., Abbeville, GA 31001;



**Wilkes County District Attorney, Dennis C. Sanders**, in his official capacity; located at P.O. Drawer 966, Thompson, GA 30824;

**Wilkes County Sheriff**, in his official capacity; located at Courthouse Annex, Washington, GA 30673;

**Wilkinson County District Attorney, Frederic D. Bright**, in his official capacity; located at 121 N. Wilkinson St., Suite 305, Milledgeville, GA 31061-3399;

**Wilkinson County Sheriff**, in his official capacity; located at 100 Hatfield St., Irwinton, GA 31042;

**Worth County District Attorney, C. Paul Bowden**, in his official capacity; located at P.O. Box 1252, Tifton, GA 31793-1252;

**Worth County Sheriff**, in his official capacity; located at 201 N. Main St., Room 14, Sylvester, GA 31791;

**James E. Donald**, Commissioner, Georgia Department of Corrections, in his official capacity; located at 2 Martin Luther King, Jr. Drive, SE, Twin Towers-East, Room 854, Atlanta, Georgia 30334.

#### **NATURE OF CASE**

Now COMES, the Plaintiff, and hereby complains of civil rights deprivations, or attempt(s) thereof, under and by the

DEFENDANTS pursuant to newly-passed legislation formerly known as S.B. (Senate Bill) 474, enacted, now codified, and rendered effective, as of 1 January, 2009, as an amendment (in part) of the Official Code of Georgia Annotated (O.C.G.A.) §42-1-12, subsection (a), et seq., in the following unconstitutional parts:

**SECTION 3.**

Code Section 42-1-12 of the Official Code of Georgia Annotated, relating to the State Sexual Offender Registry, is amended by revising subsection (a) of Code Section 42-1-12, by adding two new paragraphs to read as follows:

"(21.1) '**Username**' means a string of characters chosen to uniquely identify an individual who uses a computer or other device with Internet capability to communicate with other individuals through the exchange of e-mail or instant messages or by participating in interactive online forums.

(21.2) '**User password**' means a string of characters that enables an individual who uses a computer or other device

with Internet capability to gain access to e-mail messages and interactive online forums."

**SECTION 4.**

Said Code section is further amended by revising subparagraphs (a)(16)(J) and (a)(16)(K) as follows:

"(J) If enrolled, employed, or carrying on a vocation at an institution of higher education in this state, the name, address, and county of each institution, including each campus attended, and enrollment or employment status;

(K) E-mail addresses, usernames, and user passwords; and

(L) The name of the crime or crimes for which the sexual offender is registering and the date released from prison or placed on probation, parole, or supervised release."<sup>i</sup>

**FACTS**

1) Plaintiff was found guilty of one count of Enticing a Child for Indecent Purposes, O.C.G.A. §16-6-5, in 1989, in the State of Georgia.

- 2) Plaintiff was sentenced to a term of Fifteen Years (15 years) of probation, plus fine, restitution, counseling.
- 3) Plaintiff's probation ended in April, 2004, since when he has been a free and law-abiding citizen. Plaintiff is thus no longer on either probation or parole.
- 4) Due to a 1999 violation of his felony probation, however, (caused by a single unrelated misdemeanor charge of possession of marijuana) Plaintiff was required to register as a sex offender in the State of Georgia, in which status he has remained from 1999 to the present day.
- 5) Although Plaintiff is still a registered sex offender, he is not classified as a "sexually violent predator", or "at high risk of reoffending."
- 6) Plaintiff has not been charged with, convicted of, or committed, any further sexual offense since 1990.
- 7) Plaintiff has not been charged with, convicted of, or committed, any further crime whatsoever since 1999.
- 8) The crime(s) which led to Plaintiff's registration requirements was/were neither internet-based, nor was the internet or any computer used by Plaintiff in any

manner during the circumstances leading to the commission of his crime(s).

9) O.C.G.A. §42-1-12, subsection (a), as amended by Senate Bill 474, went into effect as against Plaintiff on January 1<sup>st</sup>, 2009.

10) Plaintiff is required under O.C.G.A. §42-1-12 to re-register his personal identifying data (and now internet identifiers) with the local Sheriff's Office, no later than the first week of February, 2009 (his birthday).

11) An assertion of his right of internet privacy and anonymity by Plaintiff, as against Defendant(s), on or before the first week of February, 2009, will with certainty result in Plaintiff's arrest and incarceration (loss of personal liberty).

12) This arrest and incarceration will also occur, should Plaintiff in the future choose to reside in any of the other counties of Georgia.

**NOW WHEREFORE,** Plaintiff requests that this Court grant the following relief to protect the rights of the Plaintiff:

1. That this Court enter judgment declaring Official Code of Georgia Annotated §42-1-12, subsection (a), as amended on January 1<sup>st</sup>, 2009, by Senate Bill 474, unconstitutional generally, and/or as applied in regard to the Plaintiff;
2. That this Court enter final judgment enjoining the Defendants from enforcing Official Code of Georgia Annotated §42-1-12, subsection (a), as amended on January 1<sup>st</sup>, 2009, by Senate Bill 474, generally, and/or in regard to the Plaintiff.

**DECLARATION UNDER PENALTY OF PERJURY**

The undersigned declares under penalty of perjury that he is the plaintiff in the above action, that he has read the above complaint, and that the information contained therein is true and correct, to the best of his knowledge and belief. 28 U.S.C. §1746; 18 U.S.C. §1621.

Executed at 0945h on January 21, 2009.

Signature

A handwritten signature in dark ink, appearing to be 'J. A.', is written over a horizontal line.